June 12, 2015

Meredith Allen
Senior Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

Subject: Procurement Transaction Quarterly Compliance Filing (Q3, 2014) and Supplemental Filings

Dear Ms. Allen:

Advice Letter 4522-E, 4522-E-A, and 4522-E-B are effective March 29, 2015.

Sincerely,

Edward Randolph
Director, Energy Division
February 27, 2015

Advice 4522-E-B  
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject**: Second Supplemental: Procurement Transaction Quarterly Compliance Filing (Q3, 2014)

Pacific Gas and Electric Company ("PG&E") is submitting this advice letter to the California Public Utilities Commission ("Commission" or “CPUC”) related to its Procurement Transaction Quarterly Compliance Report (“QCR”) for record period July 1, 2014, through September 30, 2014, (Q3-2014) to correct a non-material error in an attachment to the original submittal (Advice Letter 4522-E).

**Background**

PG&E submitted its QCR for Q3-2014 on October 30, 2014 in accordance with D.03-12-062, Ordering Paragraph 19, which requires that the Quarterly Procurement Plan Compliance Reports be submitted within 30 days of the end of the quarter.

PG&E’s Q3 2014 Attachment D, Summary of Gas Transactions, AttachD-GasPhys Summary (term) tab, includes three summary data tables for the term gas physical transactions for the quarter. The third table should have reflected zero (0) transactions, but it reflects data left over from the previous quarter, although the corresponding data set in Attachments A and B, from which Attachment D is calculated, was correct. PG&E has since automated the process for completing Attachment D so that these errors do not occur in the future. PG&E is submitting an updated Attachment D to reflect the corrections to the AttachD-GasPhys Summary (term) tab.

**Request**

PG&E requests the Commission approve Advice Letters 4522-E, 4522-E-A and 4522-E-B.
Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than March 19, 2015, which is 20 days after the date of this filing. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Meredith Allen
Senior Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-7226
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Rule 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Rule 3.11).

Effective Date

In accordance with D.02-10-062, the requested effective date of this Tier 2 advice letter is March 29, 2015, which is 30 days after the date of filing.
Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the service lists for Rulemaking (“R.”) R.12-03-014, R.01-10-024, and R.11-10-023. Address changes to the General Order 96-B service list and all electronic approvals should be sent to e-mail PGETariffs@pge.com. For changes to any other service list, please contact the Commission’s Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Advice letter filings can also be accessed electronically at: http://www.pge.com/tariffs.

/S/
Meredith Allen
Senior Director, Regulatory Relations

cc: Service List R.12-03-014, R.01-10-024, R.11-10-023 (Public Version)
PG&E’s Procurement Review Group (Confidential Version)

Attachments:
Attachment 1 – Confidentiality Declaration and Matrix (Public)
Attachment 2 – Attachment D to the Q3 QCR (Confidential)
**CALIFORNIA PUBLIC UTILITIES COMMISSION**

**ADVICE LETTER FILING SUMMARY**

**ENERGY UTILITY**

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**MUST BE COMPLETED BY UTILITY** (Attach additional pages as needed)

<table>
<thead>
<tr>
<th>Company name/CPUC Utility No.</th>
<th>Pacific Gas and Electric Company (ID U39 E)</th>
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<tbody>
<tr>
<td><strong>Utility type:</strong></td>
<td>Contact Person: Jennifer Wirowek</td>
</tr>
<tr>
<td>☑ ELC</td>
<td>Phone #: (415) 973-1419</td>
</tr>
<tr>
<td>☑ GAS</td>
<td>E-mail: <a href="mailto:J6ws@pge.com">J6ws@pge.com</a> and <a href="mailto:PGETariffs@pge.com">PGETariffs@pge.com</a></td>
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<tr>
<td>☑ PLC</td>
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<tr>
<td>☑ HEAT</td>
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<tr>
<td>☑ WATER</td>
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</table>

**EXPLANATION OF UTILITY TYPE**

| ELC = Electric | GAS = Gas |
| PL = Pipeline  | HEAT = Heat |
| WATER = Water  |           |

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**Advice Letter (AL) #:** 4522-E-B  
**Subject of AL:** Second Supplemental: Procurement Transaction Quarterly Compliance Filing (Q3, 2014)  
**Keywords (choose from CPUC listing):** Compliance, Procurement

**AL filing type:** ☑ Monthly ☑ Quarterly ☑ Annual ☑ One-Time ☑ Other ☑ Supplement to Quarterly AL

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.12-01-033, D.12-04-046 and D.03-12-062

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Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL: ____________________

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for: Yes. Please see attached Confidentiality Declarations and Matrix

Confidential information will be made available to those who have executed a nondisclosure agreement: ☑ Yes ☑ No

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: Pete Koszalka (415) 973-3818

Resolution Required? ☑ Yes ☑ No

**Requested effective date:** March 29, 2015

**Estimated system annual revenue effect (%):** N/A

**Estimated system average rate effect (%):** N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

**Tariff schedules affected:** N/A

**Service affected and changes proposed:** N/A

**Pending advice letters that revise the same tariff sheets:** N/A

Protests, dispositions, and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

**California Public Utilities Commission**

Energy Division  
EDTariffUnit  
505 Van Ness Ave., 4th Flr.  
San Francisco, CA 94102  
E-mail: EDTariffUnit@cpuc.ca.gov

**Pacific Gas and Electric Company**

Attn: Meredith Allen  
Senior Director, Regulatory Relations  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, CA 94177  
E-mail: PGETariffs@pge.com
Attachment 1

Confidentiality Declaration & Matrix
I, Pete Koszalka, declare:

1. I am presently employed by Pacific Gas and Electric Company (PG&E) and have been an employee since 2003. My current title is Director, Electric Gas Supply in the Energy Supply Management Department, which is part of the Energy Procurement Department. I am responsible for physical and financial trading of gas in support of PG&E’s allocated Department of Water Resources contracts, PG&E’s Utility Retained Generation plants, and PG&E’s tolling agreements. In carrying out these responsibilities, I have acquired knowledge of gas supply and gas hedging for electric generation, the markets for physical and financial products for gas supply and hedging, and the various types of transactions involved.

2. Based on my knowledge and experience, and in accordance with Decision (“D.”) 08-04-023 and the August 22, 2006 “Administrative Law Judge’s Ruling Clarifying Interim Procedures for Complying with Decision 06-06-066,” I make this declaration seeking confidential treatment of PG&E’s February 27, 2015 Supplemental Advice Letter 4522-E-B, Confidential Attachments D. By this Application, PG&E is seeking the Commission’s approval of Quarter Three, 2014 Procurement Transaction Quarterly Compliance Report, submitted by PG&E.

3. Attached to this declaration is a matrix identifying the data and information for which PG&E is seeking confidential treatment. The matrix specifies that the material PG&E is seeking to protect constitutes the particular type of data and information listed in Appendix I of D.06-06-
066 and Appendix D.08-04-023 (the “IOU Matrix”), and/or constitutes information that should be protected under General Order 66-C. The matrix also specifies the category or categories in the IOU Matrix to which the data and information corresponds, and why confidential protection is justified. Finally, the matrix specifies that: (1) PG&E is complying with the limitations specified in the IOU Matrix for that type of data or information; (2) the information is not already public and/or cannot be reasonably redacted; and (3) the data cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure. By this reference, I am incorporating into this declaration all of the explanatory text in the attached matrix that is pertinent to this submittal.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on February 27, 2015, at San Francisco, California.

/s/
Pete Koszalka
Director, Electric Gas Supply
Energy Supply Management
PACIFIC GAS AND ELECTRIC COMPANY
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<th>Redaction Reference</th>
<th>1) The material submitted constitutes a particular type of data listed in the Matrix, appended as Appendix 1 to D.06-06-066 (Y/N)</th>
<th>2) Which category or categories in the Matrix the data corresponds to:</th>
<th>3) That it is complying with the limitations on confidentiality specified in the Matrix for that type of data (Y/N)</th>
<th>4) That the information is not already public (Y/N)</th>
<th>5) The data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure (Y/N)</th>
<th>PG&amp;E’s Justification for Confidential Treatment</th>
<th>Length of Time</th>
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<tr>
<td>Document:</td>
<td>1) Item I) B) 2) Utility recorded gas procurement and cost information</td>
<td>2) Item I) A) 4) Long-term fuel (gas) buying and hedging plans</td>
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<tr>
<td>Attachment D – Natural Gas Transactions</td>
<td>Y</td>
<td></td>
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<td></td>
<td>Actual quantity and cost of procured physical term gas are protected. PG&amp;E’s hedging strategies may be deduced through an analysis of PG&amp;E’s summarized transactions.</td>
<td>Financial transactions are confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8)</td>
<td>Utility recorded physical gas procurement and cost information is confidential for one year.</td>
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**PG&E Gas and Electric**  
**Advice Filing List**  
**General Order 96-B, Section IV**

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